

**7:15-cv-01804-RDP**

12/4/13	<b>Although Brown has been responsible for viewing all team members' GSK 360 entries for 2 years, for the first time, Brown discovered Brandon has been logging in GSK 360 calls under the name of health care professional rather than account name of pharmacy; Reports to Johnson and Chaney.</b>	Doc. 92-12 (GSK/Brandon 002297)
Post 12/4/13	<b>Chaney casually comments about Brandon correcting some GSK 360 call entries in Brandon's annual review; Review takes place prior to Brandon's December 15<sup>th</sup> trip to Pensacola training.</b>	Doc. 92-3 413:19-23, 414:7-13, 415:3-4:16:12; Doc. 92-1 Brandon Dec. ¶ 11
12/5/13	<b>Chaney emails Johnson and copies Brown that she wants to talk to Johnson on Monday (12/9/13) about "next steps before you meet with Anne"</b>	Doc. 92-12 (GSK/Brandon 002332)
12/6/13	<b>Johnson emails Chaney confirming they will talk Monday about "helping Anne with her tracker and calls" and to "just let me know how you want me to approach this with her."</b>	Doc. 92-12 (GSK/Brandon 002349)
12/9/13	<b>Chaney emails all CPT team to announce she is a top 20 finalist out of 136 nominations for an Excellence in Leadership Award for 2013.</b>  <b>At stake was a trip to London, to go to the GSK office and meet the President of GSK and other award winners.</b>	Doc. 94-1 81:2-13.
12/10/13	<b>Chaney directs Brandon to obtain additional training from Johnson</b>	Doc. 92-13 (GSK/Brandon 002522)
12/12/13	<b>Chaney directs Brandon to spend a day reviewing GSK 360 with Johnson. Chaney reminds Brandon that she expects "all your calls with be re-entered correctly into the system that day" and reminds her that not meeting her goal can have "impact on your incentive compensation"</b>	Doc. 92-12 (GSK/Brandon 002560)
12/13/13	<b>Chaney emails manager Bill Story seeking input on GSK 360 issue with Brandon and copies Maja Hall.</b>  <b>Story is a GSK IT "expert" knowledgeable about GSK 360.</b>  <b>Maja Hall is GSK employee who was Operations for Community Pharmacy</b>	Doc. 92-12 (GSK/Brandon 000654) Doc. 92-3 243:12-144:12 Doc. 92-3 183:16-24

12/13/13	<b>Chaney writes note: Brandon told Johnson that “she was going to call HR on me because of unrealistic expectations - in her banter to Tresa [Johnson].”</b>	Doc. 92-13 (GSK/Brandon 002522)
12/13/13	<b>The same day, and nine days after becoming aware of Brandon’s GSK 360 account issue, Chaney reports Brandon to HR for the first time. Chaney emails Leslie Shoenfelt, Manager of HR-Employee Relations Center, about Brandon’s GSK 360 issue.</b>	Doc. 92-13 (GSK/Brandon 000660-000662, 002479-2481)
12/13/13	<b>Chaney emails Brandon asking if she applied for another transfer away from Chaney’s team.</b>	Doc. 92-14 (GSK/Brandon 002471)
Sunday, 12/15/13	<b>Brandon complies with Chaney’s order and drives five (5) hours to Pensacola to meet with Johnson about GSK 360.</b>	Doc. 92-1 Brandon Dec ¶ 25-26
12/16/13	<b>Brandon meets with Johnson; Enters the approximately 20 calls Chaney identified, and emails Chaney her Breo visual tracker.</b>	Doc. 92-13 (GSK/Brandon 02508-02509); Doc. 92-4 142:6-13
12/17/13	<b>Brandon enters 2 days worth of calls. Johnson reports to Chaney that Brandon confidently demonstrated how to enter a GSK 360 call under the account name, request a CID, and complete the Breo visual tracker.</b>	Doc. 92-15, GSK/Brandon 002522, 002555
12/17/13	<b>Brown contacts Chaney and labels Brandon entering her calls correctly as a “Christmas miracle.”</b>	Doc. 92-15 (GSK/Brandon - 002532)
12/17/13	<b>Brandon emails Chaney and Johnson to thank Johnson for her help and state she has been “re-entering calls for last 13 hrs!”</b>	Doc. 92-15 (GSK/Brandon 002533)
12/18/13	<b>Chaney emails Brandon “[f]antastic! I’m glad to see you understand the process and know how to correctly enter your calls into GSK 360. Please confirm when you have re-entered all your calls via email.”</b>	Doc. 92-15 (GSK/Brandon 002556)
12/19/13	<b>Chaney was aware that her demands on Brandon caused her emotional distress because Brandon emails Chaney “[t]hank you for the encouragement. I’m still reentering calls (and applying for CIDs and affiliating and calling on customers during the day, and have cried for two days while doing so).”</b>	Doc. 92-15 (GSK/Brandon 002556).

12/22/13	<b>All Brandon's Breo calls were re-entered by this date.</b>	Doc. 92-32 (GSK/Brandon 002565); Doc. 94-1 122:2-123:4
1/3/14	<b>Brandon seeks medical treatment for stress related to treatment by Chaney.</b>	Doc. 92-1 Brandon Dec. ¶ 53-54
1/14/14, 10:43 p.m.	<b>Brown emails Rob Keiser a list of 48 stores in Brandon's territory</b>	Doc. 92-16 (GSK/Brandon 002776)
1/14/14	<b>Chaney documents in her notes Brandon completed 93 calls from Nov. 9 to Dec. 4, 2013 that Brandon mistakenly listed under professional calls and not accounts.</b>	Doc. 92-15 (GSK/Brandon 003059)
1/14/14, 11:00 p.m.	<b>Despite the fact Brandon already demonstrated her ability to enter calls correctly in on 12/17/13, Chaney directs Johnson to schedule a live meeting (via computer) to watch Brandon enter 20 other calls before GSK360 shut down</b>	Doc. 92-16 (GSK/Brandon 002764)
1/14/14, 11:10 p.m.	<b>Brown emails Johnson and Chaney a list of 20 calls on Brandon's target list that need to be closed out or re-entered. Brown suggests Chaney use a computer program to watch Brandon live correct all 20 calls. Despite the "urgency" of the upcoming deadline, no one emails Brandon about these 20 calls until the next day.</b>	Doc. 92-15 (GSK/Brandon 002759)
1/15/14 12:14 a.m.	<b>Chaney orders Brandon to meet via computer with Johnson to enter Breo calls that need to be closed or re-entered before GSK360 goes "down for a few days" and to send Chaney <i>email confirmation</i> that she has entered every call by January 16<sup>th</sup>.</b>	Doc. 92-16 (GSK/Brandon 002736)
1/15/14, 5:28 a.m.	<b>Chaney reports to Brandon that there are 133 Breo target stores that need to be called upon and entered into the system before January 24. Chaney states it is "unrealistic" for Brandon to reach this goal and that Chaney is sending 4 team members to work in Brandon's territory</b>	Doc. 92-16 (GSK/Brandon 002738)
1/15/14, 12:51 p.m.	<b>Brandon notifies Chaney that she completed all calls and she had left Chaney an voice mail earlier.</b>	Doc. 92-16 (GSK/Brandon 002736)
1/15/14, 5:54 p.m.	<b>Chaney emails Brandon that she has no voice mail from Brandon and that Chaney had requested Brandon <i>telephone her</i> when Brandon completed all her calls.</b>	Doc. 92-16 (GSK/Brandon 002736)

1/15/14, 1:22 a.m.	<b>Johnson emails Chaney about counting calls made during “Operation Alabama”</b>	Doc. 92-16 (GSK/Brandon 002771)
1/15/14, 5:31 a.m.	<b>Chaney notifies Johnson she is telling Brandon at 11:00 a.m. that Brown, Johnson, Rob Keiser, and Sonya Bailey are “coming into her territory. For your purposes, don’t get caught up in her questions about the strategy - I will walk her through that - just get her focused on entering the calls and closing them out.”</b>	Doc. 92-16 (GSK/Brandon 002764)
1/15/14, 6:15 p.m.	<b>Johnson reports to Chaney that she watched Brandon correct all 20 calls.</b>	Doc. 92-15 (GSK/Brandon 002754)
1/15/14, 3:35 p.m.	<b>Chaney complaints about Brandon to Shoenfelt in HR and requests input on “how to proceed” with Brandon.</b>	Doc. 92 (GSK/Brandon 002751)
1/17/14	<b>Brandon requests FMLA beginning January 20<sup>th</sup> for her own health condition.</b>  <b>Brandon receives short-term disability policy benefit of her salary for a portion of her FMLA leave period.</b>	Doc. 92-28 (GSK/Brandon 000231). Doc. 92-28 (GSK/Brandon 000243).
Saturday, 1/18/14	<b>Chaney emails Brandon requesting a list of stores Brandon saw that day, and a screenshot of her calendar every day until January 24, 2014.</b>  <b>Chaney did not talk to Anne about taking leave.</b>	Doc. 92-1, ¶ 52  Doc. 92-3 Depo 100:10-21
Saturday, 1/18/14	<b>Brown emails Chaney that she completed her list of 18 Alabama stores, but cannot enter them into GSK360 because the system is down until Tuesday (January 22, 2014).</b>	Doc. 94-2 (GSK/Brandon 002805)
1/19/14	<b>Johnson emails Chaney she has traveled from Orlando and Montgomery, AL, the past 2 weeks, has completed all her 360 calls, helped Brandon finish calls in Prattville/Montgomery and work with Brandon for 3 hours to resolve 20 of her calls that were not valid due to no product or no contact.</b>	Doc. 92-16 (GSK/Brandon 002811)
1/20/14, 7:56 a.m.	<b>Carolyn Harriss, Disability Case Manager, notifies Chaney that Brandon has requested medical leave.</b>	Doc. 92-17 GSK/Brandon 002833
1/20/14, 9:30 a.m.	<b>Chaney emails Lorenzo Claridy, another CPT Manager, that “Anne went out on short term disability as of today...” and he responds, “not surprised; you had all the evidence ...wow... I will call you.”</b>	Doc. 92-17 GSK/Brandon 002836

1/20/14, 11:02 a.m.	<b>Chaney emails her supervisor, Darrin Holland, “To keep you in the loop, Anne is going out on leave!”</b>	Doc. 92-17 GSK/Brandon 002833
1/20/14, 2:50 p.m.	<b>The same day that Harriss notifies Chaney that Brandon is taking FMLA, Chaney begins collecting negative information about Brandon. Chaney directs Brown to research what dates Brandon has received “formal” training; Brown reports the dates as 12/4/12, 7/2013, 11/4/2013; Brandon was only trained on entering data in “account” versus “professional” in November 2013.</b>	Doc. 92-21 GSK/Brandon 002818; Doc. 92-13 344:24-348:21
1/20/14, 8:15 p.m.	<b>Chaney emails Leslie Shoenfelt, HR, Anne’s letter of request for STD</b>	Doc. 92-17 GSK/Brandon 002898
1/23/14	<b>Brown emails Chaney the results of her continued investigation into Brandon’s other documentation, citing incorrect entry in a SAP in August 2013 and Chaney responds “that doesn’t make any sense...”</b>	Doc. 92-22 (GSK/Brandon 003057- 003058)
1/24/14	<b>Launch of Breo.</b>	Doc. 94-1 150:16-19
1/24/14	<b>For the first time ever, Chaney questions Brandon’s request for reimbursement of office supplies. Chaney reports to Leslie Shoenfelt in HR that she was beginning to question Brandon’s \$19.60 expense reimbursement request for office supplies from Michaels, and seeks HR’s recommendation for action. “I have seen repeatedly on her expense report a lot of items for office supplies and I am beginning to question some of the items she is buying.”</b>	Doc. 28-23 (GSK/Brandon, 003067-003074
02/2014	<b>Chaney promotes Brown to Senior Account Specialist.</b>	Doc. 83-43, Brown Dec. ¶ 16
2/28/14	<b>Chaney reports to Harriss, GSK Disability Nurse Case Manager, that Brandon has many work issues.</b>	Doc. 92-28 (GSK/Brandon 000229); Doc. 92-20 GSK/Brandon 3179

2/28/14	<b>Chaney documents that Brandon is “not interacting with the nurse [Carolyn Harriss] at all” and that Harris “asked me if there is a performance issue with Anne.” Chaney documents “we can suspend her disability” and “very little has to be afforded with FMLA.” Chaney documents Brandon is “halfway through her FMLA which is 12 weeks. If she is out of compliance, they suspend STD and run out of benefits and it goes into Denial. Suspension happens, the pay stops of the employee. 1 week suspension. Formal Denial - if they don’t respond, they close the claim. These folks are usually terminated for job abandonment. Anne has used 6 weeks of her FMLA it exhausts on 4/12.”</b>	Doc. 92-20 GSK/Brandon 003179
4/6/14	<b>GSK approves FMLA and makes it apply retroactively to 1/20/14.</b>	Doc. 92-28 GSK/Brandon 000231, 000242
3/29/14	<b>Brandon emails Chaney notice that her American Express card payment was 60 days overdue.</b>	Doc. 92-37 GSK/Brandon 003212
5/7/14	<b>Chaney discourages other employees from letting Brandon know shw is missed. Chaney collaborates with her co-worker, Lorenzo Claridy, about whether another employee, Katy Salguero, should send Brandon a plant on behalf of CPT to show her she is missed. Claridy states “[s]ending something could possibly signal us knowing there is something wrong.” Chaney responds “[t]hat’s how I feel. Plus I have background information.” Chaney tells Salguero that when someone is on leave, contact is limited to the case manager.</b>	Doc. 92-24 Brandon/GSK 003436-003438, 003433
5/27/14	<b>Candi Bertini, Manager Disability Services, emails Chaney to ask if temporary sedentary work an option for Brandon “(i.e., work at home) Two, three or four weeks potential.”</b>	Doc. 92-25 GSK/Brandon 003522
5/27/14	<b>Chaney emails Claridy request for his perspective on how much time another employee had to work at home at the end of her medical leave because “I have just received a request for Anne to return to work and work at home for 2-3-4 weeks!” Claridy emails Chaney “[l]et me know how things go with Anne.”</b>	Doc. 92-25 GSK/Brandon 003499-003503
5/28/14	<b>Chaney emails Colleen Picket, Field Vice President - Community Pharmacy, that she is “working out a transition plan for Anne once she returns to work” and that Chaney and the case manager would meet with Brandon to discuss the transition plan “once there is a return to work date.”</b>	Doc. 92-26 GSK/Brandon 03568–03569



6/5/14	<b>Chaney emails Pickett that Brandon “doesn’t want to return to work although GSK has provided temporary considerations if she chooses it. She has not expressed interest in reduced hours or sedentary work....”</b>	Doc. 92-26 GSK/Brandon 003576
6/5/14	<b>Chaney notes that “[s]he doesn’t want to work and GSK can provide temporary consideration if the employee chooses it. She has not chosen it yet. She has exhausted her Family Medical Leave. She is saying she can’t work at all and there is no request for accommodations. The next step is discussing with Wanda from an employment perspective.” Chaney notes that the next step is to send a letter saying “we communicated and haven’t heard from you. We are able to provide you accommodation, you might require from a physician. If we don’t hear from you, we should assume you don’t want to return to work and resign from your employment.”</b>	Doc. 92-26 GSK/Brandon 003575
6/12/14	<b>GSK sends letter to Brandon not offering transition back to work, or accommodation. Letter states her return to work date is June 16, 2014, and to expect someone from Employee Health Services to contact her soon after June 16 to schedule a return to work meeting with her and her manager. Also states “[i]f we do not hear from you on June 16, we will have to reconsider your employment status. . . .”</b>	Doc. 92-26 GSK/Brandon 000689
6/16/14	<b>Brandon resigns.</b>	Doc 92-34
6/25/14	<b>Stephanie Sigmon, HR Representative, emails Shoenfelt that Brandon called to make a formal complaint against Chaney and stated six employees left GSK since 2011 because of Chaney’s treatment. Brandon reported she spoke to three of these employees who said they complained about Chaney and provided feedback on the exit survey and “never heard back from anyone.” Sigmon requests Shoenfelt to call Brandon</b>	Doc. 92-27 GSK/Brandon 000698
10/9/14	<b>Brandon files first EEOC charge</b>	Doc. 1-1, p. 2
11/24/14	<b>GSK sends Brandon a letter demanding she payback \$1,750 incentive compensation she had been paid.</b>	Doc. 92-36
1/29/14	<b>GSK sends Brandon a second notice of overpayment of \$1,750.50 incentive compensation.</b>	Doc. 92-36
1/30/15	<b>Southwest Credit notifies Brandon she owes \$101.61 for my business cell phone.</b>	Doc. 92-36
3/25/15	<b>Receivable Management Services, a debt collector retained by GSK, notifies Brandon that the \$1,750 payment is severely overdue and threatened a civil lawsuit.</b>	Doc. 92-36



4/17/15	<b>Brandon files a Retaliation EEOC Charge</b>	Doc. 1-2
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